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April 18, 2008

The Honorable George Hawkins
Director
District of Columbia Department of the Environment
51 N Street NE, 6th Floor
Washington, DC 20002

Dear Director Hawkins:

I am writing to follow up on my previous letter of April 2, 2008. That letter was in response to your information request to Chevron dated March 20, 2007 [sic], and received on March 21, 2008.

In this letter, I am enclosing a copy of a letter from Air Toxics which details our efforts to research the TO-15 sampling analytical data and explains the limitation of the additional TO-15 data.

Given these limitations of the data based on Air Toxics enclosed letter, Chevron believes that even if Air Toxics were to review the archived chromatograph data, the results may not be appropriate for use in a risk assessment. The consequent potential to distort any risk assessment in which these data are used, or to mislead residents concerning the levels of compounds present, outweighs any value that the data may present.

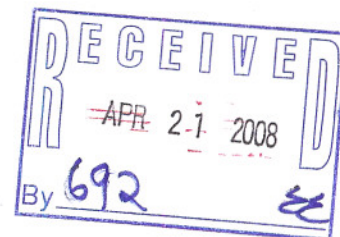
Chevron welcomes the opportunity to assist the District as appropriate. However, Chevron wants to again make clear that the District's March 20 Information Request concerns data not previously developed by or for Chevron or its contractors, and that the requested data is not otherwise in Chevron's possession except as already provided to the District and to the public. Chevron further considers this data, were it to be developed, of limited value as it was not part of the original Data Quality Objective of the project; and concerns compounds (non-Gasoline Range Organics) that cannot be linked to former Chevron Facility 122208.

We look forward to communication from the District concerning any additional data and analyses that might be useful. In the meantime, Chevron understands that the previous submittal fully responded to the District's March 20, 2008 Information Request.

Sincerely,

Judson C. Polikoff
Assistant Secretary
Chevron U.S.A. Inc.

cc: Councilmember Bowser- DC Council
Ms. Bicky Corman – DC DOE
Mr. Abraham Ferdas– USEPA





180 Blue Ravine Road, Suite B Folsom, CA 95630

April 4, 2008

Mr. Robert Scrafford
Environmental Scientist/Engineer
Gannett Fleming, Inc.
4701 Mt. Hope Drive, Suite A
Baltimore, MD 21215

Dear Mr. Scrafford,

In response to your request, we have detailed the process as well as cost and quality implications associated with reissuing a set of workorders generated for the Chevron Chillum site. The original reports submitted to Gannett Fleming were limited to a subset of project-specified target compounds. These compounds were communicated to Air Toxics by Gannett Fleming during project set-up. The reissued workorders would provide the results for the full 60-compound standard TO-15 list. The reports identified by Gannett Fleming for possible reissue are summarized in Table 1.

Table 1. Targeted workorders for reissue

Workorders
0706078
0706171R1
0706204R1
0504479
0505004R1
0505170
0505331
0505483
0506168
0506299
0507269

Reissue Process

As per Air Toxics' procedures, samples are disposed after the sample results are verified against laboratory and project specifications at the time of analysis. However, it is Air Toxics' policy to archive all electronic data records for a minimum period of five years. The archived data records include the sample results provided to our clients as well as all of the complete raw data used to generate these results. To reissue the workorders, the GC/MS instrument data files from the samples and QC runs are restored to the processing software (Target Thru-put) from the data archives. The data files contain the calibration table for the full list of compounds, the raw mass spectra and peak information acquired by the GC/MS for each run, as well as the processed data files used for the original report. Because the Gannett Fleming data files were processed and



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reviewed for project-specified subset of compounds only, these data files require re-processing for the full list of calibrated compounds. None of the original data files are over-written in the reissue process. The re-processed files have a unique file extension "r #" to indicate the revision and the version. The re-processed data undergoes the same review process as the original report. This includes evaluation of each target compound in the samples, evaluation of the QC samples against laboratory requirements, narration and qualification of non-compliant quality control, review of final report by senior staff, and approval of re-issued report by QA Manager or Technical Director.

Quality Considerations

Because the Chillum project was set-up for a short list of compounds per client instruction, the laboratory evaluated quality compliance for this specific list only. As a result, some of the compounds outside of the original list may be qualified. Below is a list of potential quality issues that may arise if the target compound list is expanded beyond the initial list:

- 1) Media cleanliness: Each sampling train was certified as clean to the required reporting limit for the project required short list only. Additional compounds not evaluated may not have met the required certification level, resulting in potential false positives or high bias in the associated sample results.
- 2) TO-15 QC samples: Before analyzing samples, the laboratory insures that the initial calibration, daily calibration standard, and laboratory control spike (LCS) meet acceptance criteria for the projects to be run on each TO-15 unit. Only the subset of compounds specified for Chillum was evaluated for compliance. Accuracy and precision as evaluated by the QC samples may not meet laboratory acceptance criteria for the extended list of compounds. Out of compliance QC will result in qualification of associated results.

Costs

Additional costs will be applied to cover the laboratory's labor. Our standard hourly charge is \$65/hour. To complete the three workorders from 2007, we estimate the labor required at six hours resulting in a charge of \$390. The eight workorders from 2005 are estimated to require 23.5 hours resulting in a reissue charge of \$1,527.50.

Regards,

Heidi Hayes
Technical Director
Air Toxics Ltd.